

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL NO. 16-2738 (MAS) (RLS)**

***THIS DOCUMENT RELATES TO ALL CASES***

**CERTIFICATION OF MICHELLE A. PARFITT, ESQ.**

Michelle A. Parfitt, Esq. hereby certifies as follows:

1. I am an attorney at law and senior partner at the law firm of Ashcraft & Gerel. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.
2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Dr. Kathleen Sutcliffe.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of Kathleen M. Sutcliffe, Ph.D. dated April 12, 2024.
4. Attached hereto as Exhibit 2 is a true and correct copy of the Deposition of Kathleen Sutcliffe, Ph.D., dated May 28, 2024.

5. Attached hereto as Exhibit 3 is a true and correct copy of the Harlow, et al., *Perineal Exposure to Talc and Ovarian Cancer Risk*, 80 Obstetrics & Gynecology 19 (1992).
6. Attached hereto as Exhibit 4 is a true and correct copy of the Cramer, et al., *Genital Talc Exposure and Risk of Ovarian Cancer*, 81 Int'l J. Cancer 351 (1999)
7. Attached hereto as Exhibit 5 is a true and correct copy of the Mills, et al., *Perineal Talc Exposure and Epithelial Ovarian Cancer Risk in the Central Valley of California*, 112 Int'l J. Cancer 458 (2004).
8. Attached hereto as Exhibit 6 is a true and correct copy of JNJ 000564377.
9. Attached hereto as Exhibit 7 is a true and correct copy of Gross & Berg, *A Meta-Analytical Approach Examining the Potential Relationship Between Talc Exposure and Ovarian Cancer*, 5 J. Exposure Analysis Environ. Epi. 181 (1995).
10. Attached hereto as Exhibit 8 is a true and correct copy of JNJ 000000081.
11. Attached hereto as Exhibit 9 is a true and correct copy of the Expert Report of Kathleen M. Sutcliffe, Ph.D., dated October 17, 2011.
12. I certify that the foregoing statements made by me are true. I am

aware that if any of the foregoing statements made by me are willfully false, I  
may be subject to punishment.

Dated: July 23, 2024

/s/ Michelle A. Parfitt

Michelle A. Parfitt